

**Remarks/Arguments**

Claims 1 - 13 are pending. Claims 1, 4, 7, 11 and 13 have been amended without prejudice herein.

**35 U.S.C. §112 Rejections**

Claims 1 – 13 stand rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter Applicant regards as his invention.

For purposes of expediting prosecution of the subject application, Applicant has amended the claims to address the specific concerns raised in paragraphs 1a - 1c of the May 3, 2005 Office action. More particularly, and with regard to paragraph 1a, the claims have been amended to remove references to “this column”, “this word”, “this difference”, and “its state”. With regard to paragraph 1b, Applicant has amended the claims to make clear that n can equal 2. Finally, with regard to paragraph 1c, Applicant has amended the claims to make clear that bits selectively trigger illumination of the cell of the addressed line and of the column receiving the control word.

Accordingly, Applicant respectfully requests reconsideration and removal of these rejections. Further, as no substantive grounds of rejection have been presented for Claims 4, 7 and 13, Applicant submits these claims are now in condition for allowance, the early notification of which is earnestly solicited.

35 U.S.C. §103(a) Rejections

Claims 1 - 3, 9, and 11 - 12 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saegusa (United States Patent No. 5,475,448) in view of Van Dijk (United States Patent No. 6,424,325) and now further in view of Nakamura (United States Patent No. 6,597,334). Claims 5 - 6 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saegusa, Van Dijk, Nakamura and further in view of Inoue (United States Patent No. 5,646,646). Claim 8 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Saegusa, Van Dijk, Nakamura and further in view of Sakoda (United States Patent No. 5,559,954). Claim 10 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Saegusa, Van Dijk, Nakamura and further in view of Nelson (United States Patent No. 5,771,060). Applicant respectfully traverses these rejections for at least the following reasons.

To establish a prima facie case of obviousness, all of the recited claim limitations must be taught or suggested in the prior art. *See, MPEP 2143.03; see also, In re. Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974).* Applicant respectfully submits the cited prior art references, singularly and in combination, fail to teach or suggest all of the limitations of each of the recited limitations of the pending claims.

For example, Claim 1 recites in relevant part, "writing instants which are substantially different for at least one bit of specified rank from one line to the next." (Emphasis Added). By way of example, this is shown in Fig. 8 of the present application. As is discussed with regard to Fig. 8, the weights of the control words (coded on 13 bits) are: (1) for line I: 1, 2, 4, 6, 5, 10, 24, 12, 20, 42, 58, 36, 35; and (2)

for line l+1: 1, 2, 4, 6, 5, 10, 9, 27, 20, 19, 50, 67, 35. The writing instant of the 8<sup>th</sup> bit (sub scan of weight 12) of the control word for line l is substantially different from the writing instant of the 8<sup>th</sup> bit (sub scan of weight 27) of the control word for line l+1. In an analogous manner, the writing instant of the 11<sup>th</sup> bit (sub scan of weight 58) for line l is substantially different from the writing instant of the 11<sup>th</sup> bit (sub scan of weight 50) of the control word for line l+1. And, the writing instant of the 12<sup>th</sup> bit (sub scan of weight 36) for line l is substantially different from the writing instant of the 12<sup>th</sup> bit (sub scan of weight 67) of the control word for line l+1.

With regard to this limitation, the Office action admits Van Dijk and Saegusa do not show writing instants which are substantially different from one line to the next. In an effort to remedy this admitted shortcoming of the combined teachings of Van Dijk and Saegusa, the Office action relies upon the teachings of Nakamura. Particularly, the Office action argues, "Nakamura teaches writing instants which are substantially different from one line to the next (See Fig. 3, items Pw, Col. 3 lines 32-39)."

Applicant traverses this assertion. While Nakamura may teach sequentially addressing cell lines, such that two consecutive lines are not addressed simultaneously and the writing instants slightly differ for two consecutive lines – Nakamura does not teach the writing instants are substantially different from one line to the next, as is recited by Claim 1.

Accordingly, Applicant respectfully submits the cited art of record fails to teach, or suggest, each of the limitations of Claim 1 and hence, fails to render present Claim 1 unpatentable. Applicant also respectfully requests reconsideration and removal of

the rejections of Claims 2, 3, 5, 6, 8, 9 and 10, at least by virtue of these claims' ultimate dependence from patentably distinct base Claim 1.

With regard to Claim 11, it analogously recites in part, "writing instants which are substantially different for at least one bit of specified rank from one line to the next." Accordingly, Applicant respectfully requests reconsideration and removal of the present rejection of Claim 11 for at least the foregoing reasons. Applicant also respectfully requests reconsideration and removal of the rejection of Claim 12 as well, at least by virtue of this claim's ultimate dependence upon a patentably distinct base Claim 11.

### **CONCLUSION**

Applicant believes he has addressed all outstanding grounds raised by the Examiner and respectfully submits the present case is in condition for allowance, early notification of which is earnestly solicited.

Should there be any questions or outstanding matters, the Examiner is cordially invited and requested to contact Applicant's undersigned attorney at his number listed below.

Respectfully submitted,

  
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